

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)	
Plaintiff,)	
)	Case No.: 2:19-cr-00013
v.)	
)	Chief Judge Waverly D. Crenshaw, Jr.
GEORGIANNA A.M. GIAMPIETRO)	
Defendant.)	

MOTION TO PAROLE EXPERT WITNESS INTO THE U.S.

Comes now the defendant, Georgianna Giampietro, and files the UNOPPOSED Motion to allow for the Parole of the defense expert witness, Aymenn Jawad, into the United States, so that he may testify at the Sentencing Evidentiary Hearing scheduled for Friday, June 24, 2022, at 9:00 AM. Witness Aymenn Jawad lives in the U.K.

Previously, on July 28, 2021, defense filed a Motion to Compel Assistance to Procure a Witness. (DKT 202). The Court directed the parties to discuss and possibly reach a resolution about the assistance the government would provide in getting the defense expert witness to the U.S. for trial. To that end, the parties filed a Notice Regarding defendant's Motion to Compel (DKT 204) on July 29, 2021. In this Notice, the parties agreed they would work to ensure the defense expert witness, Aymenn Jawad, would have the necessary paperwork in place with the help of the government, so that he could be paroled into the U.S. to testify at trial.

The defense now needs Mr. Jawad to attend the pre-sentencing evidentiary hearing to provide testimony on June 24, 2022, at 9:00 AM. As such, Mr. Jawad will need to be Paroled into the U.S. to provide testimony. This Court signed a Travel Authorization letter on May 12, 2022, authorizing payment for travel for Mr. Jawad. The defense is now asking for an order indicating

Mr. Jawad is a necessary witness for testimony on June 24, 2022, and that the parties are to again work to secure Mr. Jawad's appearance in the U.S. for this hearing.

The government has been consulted and has no objection to this motion.

Dated this 13th day of May, 2022.

Submitted By:

/s/ Charles Swift

CHARLES D. SWIFT

Pro Hac Vice Attorney for Defendant

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of May, 2022, I electronically filed the foregoing **Motion to Parole Expert Witness into the U.S.** with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

By: /s/ Charles Swift

CHARLES D. SWIFT

Pro Hac Vice

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